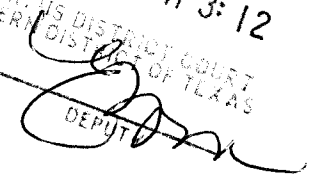


IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

2011 DEC 27 PM 3:12
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARY REBECCA ANDERSON

aka: Judy Marie Engram,

Defendant.

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§
§
§
§

NO. EP-06-CR-2563-FM (2)

**GOVERNMENT'S MOTION TO DETAIN DEFENDANT
WITHOUT BOND AND MOTION FOR CONTINUANCE**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show the Court the following:

I.

The Government at this time moves the Court to hold the above-named Defendant without bond pursuant to 18 U.S.C. § 3143(a). This request is made for the following reasons:

1. The Defendant has violated the terms of supervised release.
2. Title 18 U.S.C. § 3143(a) directs that the judicial officer shall order a defendant detained, unless the judicial officer finds by clear and convincing evidence that a defendant is not likely to flee or pose a danger to the safety of any person or the community.
3. The burden of establishing the Defendant will not flee or pose a danger to any other person or to the community rests with the Defendant.

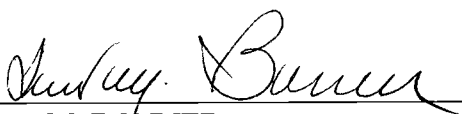
The Government would further move the Court for a three-day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

ROBERT PITMAN
UNITED STATES ATTORNEY

BY:


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